

In 1996, the public safety community issued a report culminating two years of study which projected the need for approximately 100 MHz of spectrum in addition to the public safety spectrum which existed at that time. We believe those projections are still valid. In fact, subsequent events on September 11, 2001 and follow-up activities to address prevention as well as response to such threats underscore the need for improved communications interoperability and fast access to data and video information across all levels of government.

While there has been technology development since that Public Safety Wireless Advisory Committee (PSWAC) Report was issued, much of that development is on new broadband technologies which requires even more spectrum.

Since the PSWAC report was issued, 24 MHz of spectrum in the 700 MHz band and 50 MHz of spectrum in the 4.9 GHz band was dedicated to public safety.

While the 700 MHz spectrum was provided to public safety in 1997, this band is still a hollow resource in many areas of the country since a handful of television stations remaining in the band prevent its use for public safety. It is imperative that the FCC and Congress take some definitive action this year to set a definite date by which this spectrum will be cleared for public safety use. We recommend that date be no later than yearend 2006.

Once the 700 MHz spectrum is cleared, there is still a shortfall of spectrum dedicated to public safety. Considering the 24 MHz allocated in the 700 MHz band and the 50 MHz at 4.9 GHz, there is still a shortfall of over 20 MHz according to the PSWAC projections.

One area the FCC, and if necessary Congress, needs to address is additional spectrum for wide-area broadband. The 4.9 GHz band is ideal for localized on-site broadband operations, however, bands that high in the spectrum require too many sites to provide coverage over a wide area. This is particularly critical for state police communications systems, which need to provide reliable coverage throughout the state.

Therefore, in addition to clearing the 700 MHz spectrum already allocated to public safety, we recommend the FCC allocate additional spectrum in the 700 MHz band for wide-area broadband public safety communications. First responder wide-area broadband applications often have two common requirements: full motion driving speed capability and complete mobility, allowing users ubiquitous coverage within a network or across networks over a wide area, covering a city or an entire metro area. The applications that are referenced most often by our first responders are wireless real time video and high resolution image transfer, both to the first responders in the field and from the first responder to dispatch and other responders. Such applications require large bandwidth.

Though state and local public safety agencies use commercial cellular service for administrative traffic and communications with the public we serve, our experience shows that only dedicated communications systems designed specifically for public safety needs provide the reliability, features and flexibility needed by our officers for their critical internal communications. Similar to today's need for dedicated mission critical voice communications, public safety cannot rely on unlicensed or commercial technologies to meet our mission critical broadband applications.